

From: [Blend, Jeff](#)
To: [Tina Laidlaw/MO/R8/USEPA/US@EPA](#)
Subject: RE: is this correct?
Date: 11/03/2011 08:02 AM

Tina:

Were these your notes? This morning, I am writing up an outline of our private-side approach. I will use this as a base and add to it. It looks mostly correct. Thanks.

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-----Original Message-----

From: Laidlaw.Tina@epamail.epa.gov [mailto:Laidlaw.Tina@epamail.epa.gov]
Sent: Wednesday, November 02, 2011 2:40 PM
To: Blend, Jeff
Subject: is this correct?

. MDEQ is exploring an approach that applies multiple lines of information to build a Factor 6 demonstration. The following types of information will be considered:

- o MDEQ will provide the templates to private dischargers. If plants are willing to share their economic analyses, that information can be used by MDEQ.
- o Some dischargers may not offer detailed financial information but may be willing to demonstrate that they exceed a specific threshold (e.g., costs to revenue). Some dischargers may be willing to share this data with MDEQ.
- o In 2009, several industry sectors presented treatment information with associated costs. These presentations may provide useful financial information for oil and gas and mines.
 - \$ Stillwater Mine implements land application, RO, and microfiltration and discharges to GW that connects to SW. This example could be useful to evaluate what nitrogen concentrations can be achieved using RO and could be used to determine costs per reduction in nitrogen concentrations.
- o Do technologies exist that can achieve the criteria?
 - \$ What would the implications be if plants had to close?
 - \$ What are the costs for brine disposal, especially if ~50 dischargers across the state were trying to transport brine and find appropriate disposal methods?
 - \$ What would non-discharging alternatives cost? Is this approach even viable in Montana?
- o The University of MT's Bureau of Economic Research maintains financial information on various industrial sectors. MDEQ will learn what financial information can be obtained from this group and/or if the group is willing to work with the State on the S&W demonstration.
- o A description of the Montana private sector climate and current support for industrial facilities compared to other
- o Cost curves: what is the costs for incremental reductions in N (and maybe P), especially compared to the costs associated with increased greenhouse gas emissions.

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